

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

JURY TRIAL DEMANDED

This Document Relates to:

JANE DOE 691532

**SHORT-FORM COMPLAINT AND DEMAND FOR JURY TRIAL**

The Plaintiff named below files this *Short-Form Complaint and Demand for Jury Trial* against Defendants named below by and through the undersigned counsel. Plaintiff incorporates by reference the allegations contained in *Plaintiffs' Master Long-Form Complaint in In Re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, MDL No. 3084 in the United States District Court for the Northern District of California. Plaintiff files this *Short-Form Complaint* as permitted by Case Management Order No. \_\_\_\_ of this Court.

Plaintiff selects and indicates by checking-off where requested, the Parties and Causes of Actions specific to this case.

Plaintiff, by and through their undersigned counsel, allege as follows:

**I. DESIGNATED FORUM<sup>1</sup>**

1. Identify the Federal District Court in which the Plaintiff would have filed in the absence of direct filing:

**United States District Court for the Northern California.**

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("Transferee District Court").

**II. IDENTIFICATION OF PARTIES**

**A. PLAINTIFF**

1. *Injured Plaintiff*: Name of the individual who alleges they were sexually assaulted, battered, harassed, or otherwise attacked by an Uber driver with whom they were paired while using the Uber platform:

JANE DOE 691532

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("Plaintiff").

2. At the time of the filing of this *Short-Form Complaint*, Plaintiff resides at:

Reno, NV

3. (If applicable) \_\_\_\_\_ n/a \_\_\_\_\_ [INSERT NAME OF REPRESENTATIVE] is filing this case in a representative capacity as the [INSERT DESCRIPTOR I.E. ADMINISTRATOR ETC.] of the [INSERT DESCRIPTOR I.E. ESTATE OF NAME, ETC.], and has authority to act in this representative capacity because [INSERT BASIS FOR AUTHORITY].

**B. DEFENDANT(S)**

1. Plaintiff names the following Defendants in this action.

✓ UBER TECHNOLOGIES, INC.;<sup>2</sup>

✓ RASIER, LLC;<sup>3</sup>

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<sup>1</sup> See Pretrial Order No. 6, at II(C) (ECF No. 177).

<sup>2</sup> Delaware corporation with a principal place of business in California.

<sup>3</sup> A limited liability company whose sole member, Uber Technologies, Inc., is a citizen of Delaware and California.

✓ RASIER-CA, LLC.<sup>4</sup>

☐ OTHER (specify): \_\_\_\_\_. This defendant's residence is in (specify state): \_\_\_\_\_.

**C. RIDE INFORMATION**

1. The Plaintiff was sexually assaulted, harassed, battered, or otherwise attacked by an Uber driver in connection with a ride facilitated on the Uber platform in Reno Nevada on July 14, 2022.
2. The Plaintiff was the account holder of the Uber account used to request the relevant ride.
3. The Plaintiff provides the following additional information about the ride:

**[PLEASE SELECT/COMPLETE ONE]**

✓ The Plaintiff hereby incorporates Plaintiff's disclosure of ride information produced pursuant to Pretrial Order No. 5 ¶ 4 on September 20, 2024 or to be produced in compliance with deadlines set forth in Pretrial Order No. 5 ¶ 4, and any amendments or supplements thereto.

☐ The origin of the relevant ride was in [STREET ADDRESS, CITY, STATE]. The requested destination of the relevant ride was [STREET ADDRESS, CITY, COUNTY, STATE]. The driver was named [DRIVER NAME].

**III. CAUSES OF ACTION ASSERTED**

1. The Causes of Action asserted in the *Plaintiffs' Master Long-Form Complaint*, and the allegations with regard thereto in the *Plaintiffs' Master Long-Form Complaint*, are adopted in this *Short-Form Complaint* by reference, except that Plaintiff opts out of and excludes the causes of action specified below:

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<sup>4</sup> A limited liability company whose sole member, Uber Technologies, Inc., is a citizen of Delaware and California.

Check any EXCLUDED causes of action	Cause of Action Number	Cause of Action
<input type="checkbox"/>	I	NEGLIGENCE (including Negligent Hiring, Retention, Supervision, and Entrustment)
<input type="checkbox"/>	II	FRAUD AND MISREPRESENTATION
<input type="checkbox"/>	III	NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
<input type="checkbox"/>	IV	COMMON CARRIER'S NON-DELEGABLE DUTY TO PROVIDE SAFE TRANSPORTATION <sup>5</sup>
<input type="checkbox"/>	V	OTHER NON-DELEGABLE DUTIES TO PROVIDE SAFE TRANSPORTATION <sup>6</sup>
<input type="checkbox"/>	VI	VICARIOUS LIABILITY FOR DRIVERS' TORTS – EMPLOYEE
<input type="checkbox"/>	VII	VICARIOUS LIABILITY FOR DRIVERS' TORTS – APPARENT AGENCY
<input type="checkbox"/>	VIII	VICARIOUS LIABILITY FOR DRIVERS' TORTS – RATIFICATION
<input type="checkbox"/>	IX	VICARIOUS LIABILITY FOR DRIVERS' TORTS – Cal. Public Utilities Code § 535
<input type="checkbox"/>	X	STRICT PRODUCTS LIABILITY – DESIGN DEFECT
<input type="checkbox"/>	XI	STRICT PRODUCTS LIABILITY – FAILURE TO WARN
<input type="checkbox"/>	XII	STRICT PRODUCTS LIABILITY – PRODUCT LIABILITY ACTS
<input type="checkbox"/>	XIII	UNFAIR COMPETITION LAW – Cal. Bus. & Prof. Code § 17200 et seq.

## VI. ADDITIONAL CAUSES OF ACTION AND/OR ALLEGATIONS

### NOTE

If Plaintiff wants to allege additional Cause(s) of Action other than those selected in paragraph \_\_, the specific facts supporting any such additional Cause(s) of Action, must be pled in a manner complying with the requirements of the Federal Rules of Civil Procedure (*see* paragraph \_\_). In doing so you may attach additional pages to this *Short-Form Complaint*.

- Plaintiff asserts the following additional theories against the Defendants designated in paragraph \_\_ above:

<sup>5</sup> This claim is pleaded in the *Plaintiffs' Master Long-Form Complaint* under the laws of every state **except: Arizona, Colorado, District of Columbia, Illinois** (for incidents prior to August 11, 2023), **Michigan, Montana** (for incidents prior to April 23, 2023), **New York, Pennsylvania, Wisconsin, and Wyoming**.

<sup>6</sup> This claim is pleaded in *Plaintiffs' Master Long-Form Complaint* under the laws of every state **except: District of Columbia, Michigan, New York, Pennsylvania**.

[YOU MAY ATTACH ADDITIONAL PAGES, IF NECESSARY]

NONE

2. If Plaintiff has additional factual allegations not set forth in *Plaintiffs' Master Long-Form Complaint*, they may be set forth below or in additional pages:

[YOU MAY ATTACH ADDITIONAL PAGES, IF NECESSARY]

NONE

**WHEREFORE**, Plaintiff prays for relief and judgment against Defendants for economic and non-economic compensatory and punitive and exemplary damages, together with interest, costs of suit, attorneys' fees, and all such other relief as the Court deems proper, and such further relief as the Court deems equitable and just, and as set forth in *Plaintiffs' Master Long-Form Complaint*.

### **JURY DEMAND**

Plaintiff hereby demands a trial by jury as to all claims in this action.

Dated: 09/20/2024

Sadi R. Antonmattei-Goitia (SBN 24091383)  
Kherkher Garcia, LLP  
2925 Richmond Ave., Suite 1560  
Houston, TX 77098  
Telephone: (713) 333-1030  
Facsimile: (713) 333-1029  
Email: skherkher-team@kherkhergarcia.com  
Email: rideshare@kherkhergarcia.com



July 14, 2022

## Here's your receipt for your ride, [REDACTED]

We hope you enjoyed your ride this afternoon.

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Total	\$14.18
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Trip fare	\$9.96
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Subtotal	\$9.96
Temporary Fuel Surcharge	\$0.45
Booking Fee	\$3.32
NV Recovery Surcharge	\$0.04
Transportation Recovery Tax	\$0.41

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## Payments



Visa \*\*\*\*6312

7/15/22 10:25 AM

\$14.18

[Visit the trip page](#) for more information, including invoices (where available)

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You rode with Charles

UberX 4.43 miles | 9 min



11:35 PM | 1765 Carlin St, Reno, NV 89503, US

11:44 PM | 1520 Steelwood Ln, Reno, NV 89512, US

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.